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*Attorneys for Plaintiff
Freyssinet, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FREYSSINET, INC., a Virginia corporation,

Plaintiff,

v.

BESSO INSURANCE GROUP LTD., a
United Kingdom company, and CERTAIN
UNDERWRITERS AT LLOYD'S, LONDON
SUBSCRIBING TO BESSO POLICY
NUMBER B0595XN5229017, APOLLO
LIABILITY CONSORTIUM NUMBER 9984,
including APOLLO SYNDICATE
MANAGEMENT LIMITED, a United Kingdom
company,

Defendants.

Case No. 2:21-cv-00418-APG-BNW

**JOINT MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE TO
DEFENDANTS APOLLO LIABILITY
CONSORTIUM NUMBER 9984 AND
APOLLO SYNDICATE
MANAGEMENT LIMITED'S
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

(SECOND REQUEST)

Plaintiff Freyssinet, Inc. (“Plaintiff”) and Defendants, Apollo Liability Consortium Number 9984 and Apollo Syndicate Management Limited (the “Apollo Defendants” and collectively with Plaintiff, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby jointly move and agree to extend Plaintiff’s deadline to file its response to the Apollo Defendants’ Motion to Dismiss Plaintiff’s Complaint [ECF No. 15] (the “Motion”) an additional seven (7) days to May 10, 2021, with the following background and for the following reasons:

1. Apollo Defendants filed the Motion on April 12, 2021 [ECF No. 15].
2. Plaintiff’s response to the Motion is currently due May 3, 2021.
3. The Parties have reached an agreement in principle that will obviate the need for further motion practice but need additional time to formalize their agreement.
4. On May 3, 2021, the Parties agreed to the extension requested herein.
5. This is the Parties’ second request for a week-long extension to enable them to finalize their agreement.
6. This extension request is sought in good faith and is not made for the purpose of delay.

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Therefore, the Parties respectfully request an extension for Plaintiff to file a response to the Motion to and including May 10, 2021.

Dated: May 3, 2021

SNELL & WILMER L.L.P.

/s/ Kelly H. Dove

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Freyssinet, Inc.

Dated: May 3, 2021

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*Underwriters at Lloyd's, London Subscribing
to Policy No. B0595XN5229017*

ORDER

IT IS ORDERED.

DATED: May 4, 2021.


UNITED STATES DISTRICT COURT JUDGE
2:21-cv-00418-APG-BNW